Please amend the claims as follows:

CLAIMS

1.   (Currently Amended) <u>A computing system containing encoded data that when</u> <u>executed</u> provides an anti-money laundering system for providing risk assessment determinations at a branch of a financial institution, the anti-money laundering system comprising:

a risk assessor module for providing to an authorized user of the anti-money laundering system, guidelines in identifying risks <u>dimensions</u> associated with potential money laundering transactions processed by the branch of the financial institution;

a policy builder module for recommending possible electronic and manual countermeasures to the risks identified by the risk assessor module and for enabling the authorized user to select the countermeasures of his choice in order to create a policy for the branch of the financial institution;

an account opening due diligence module for providing detailed recommendations to the authorized user as to whether to allow an application for an account at the branch of the financial institution and for applying consistent implementation of the policy throughout the branch of the financial institution;

a transaction activity monitor module for receiving and monitoring transaction information including transaction information received by the account opening due diligence module, ~~and~~ <u>identifying risk dimensions associated with potential money laundering</u> <u>transactions processed by the branch of the financial institution, assigning numerical</u> <u>designations for the risk dimensions identified for the branch of a financial institution,and</u> for identifying suspicious patterns among the transactions at the branch of a financial institution in order to provide a suspicious transaction activity report relating to potential money laundering transaction; and,

a case management and reporting module for tracking and identifying the detailed recommendations of the account opening due diligence module in order to provide continuous feedback to the authorized user about the effectiveness of the system<u>;</u>

<u>wherein identifying suspicious patterns among the transactions includes determining</u> <u>whether a financial transaction to be conducted has a risk-related dimension;</u>

determining whether the numerical designation of at least a selected one of the identified risk dimensions for the financial transaction to be conducted exceeds a predetermined level when the financial transaction to be conducted does have a risk-related dimension; and

performing a special risk assessment procedure if the numerical designation of at least a selected one of the identified risk dimensions exceeds a predetermined level.

2.   (Original)   The anti-money laundering system of claim 1, further comprising: a staff training and policy management module for using the selected countermeasures to develop customized training programs and to track compliance of users of the anti-money laundering system.

3.   (Previously presented)   The anti-money laundering system of claim 1, wherein the risks identified by the risk assessor module comprise geographic location risk, types of customers served, and types of services offered by the financial institution.

4.   (Original)   The anti-money laundering system of claim 1, wherein the policy builder module provides detailed support for the decision process in creating the policy.

5.   (Previously presented)   The anti-money laundering system of claim 1, wherein the authorized user may override for the branch of the financial institution, the detailed recommendations provided by the account opening due diligence module.

6.   (Previously presented)   The anti-money laundering system of claim 1, wherein the transaction information received and monitored by the transaction activity monitor further comprises historical data.

7.   (Previously presented)   The anti-money laundering system of claim 6, wherein the transaction information received and monitored by the transaction activity monitor further comprises input from employees of the branch of the financial institution.

8.   (Original)   The anti-money laundering system of claim 5, wherein the case management and reporting module tracks and identifies the detailed recommendations of the

account opening due diligence module that are overridden by the authorized user, and updates the account opening due diligence module based on the override.

9.   (Previously presented)   The anti-money laundering system of claim 1, wherein the risks identified by the risk assessor module are used to determine the level of review applied against a selected operation or transaction.

10.   (Previously presented)   The anti-money laundering system of claim 9, wherein the level of review is selected from the group consisting of standard review and special review.

11.   (Previously presented)   The anti-money laundering system of claim 1, wherein the system is communicatively coupled to an electronic network including a plurality of databases, and wherein the transaction activity monitor component gathers information stored on the plurality of databases in order to monitor the suspicious transactions, and processes the information to output the risk assessment guidelines and an explanation of the risk assessment guidelines.

12.   (Currently Amended) A~n~ computer implemented method having a computing system containing encoded data that when executed ~for~ provide~s~ ~ing~ anti-money laundering risk assessment determinations at a branch of a financial institution, the method comprising the steps of:

identifying risk dimensions associated with potential money laundering transactions processed by the branch of the financial institution;

assigning numerical designations for the risk dimensions identified for the branch of a financial institution;

identifying a type of financial transaction to be conducted at the branch of a financial institution;

determining whether a financial transaction to be conducted has a risk-related dimension;

determining whether the numerical designation of at least a selected one of the identified risk dimensions for the financial transaction to be conducted exceeds a

predetermined level when the financial transaction to be conducted does have a risk-related dimension;

performing a special risk assessment procedure if the numerical designation of at least a selected one of the identified risk dimensions exceeds a predetermined level; and,

providing to an authorized user recommended guidelines for handling the financial transaction to be conducted, based on the special risk assessment procedure.

13.   (Previously presented)   The method of claim 12, further comprising the step of:

performing a standard risk assessment procedure if the numerical designation of none of the identified risk dimensions exceeds a predetermined level.

14.   (Previously presented)   The method of claim 12, wherein the risk dimensions comprises:

a first risk dimension representing a risk due to a location of the branch of the financial institution;

a second risk dimension representing a risks due to selected services offered by the branch of a financial institution;

a third risk dimension representing a risks due to an identified nature of the customers served by the branch of a financial institution; and,

a fourth risk dimension representing a risks due to a particular jurisdictions served by the branch of a financial institution.

15.   (Previously presented)   The method of claim 14, wherein the risk dimensions are based on local laws, regulations, historical data, and other information that is specific to the branch of a financial institution.

16.   (Previously presented)   The method of claim 14, wherein each of the selected services has associated accounts, each of the associated accounts having a risk rating and a risk exposure rating, and wherein each risk dimension is based on the risk rating and the risk exposure rating of all associated accounts of all of the selected services.

17.   (Previously presented)   The method of claim 16, wherein the second and the third risk dimensions are based on data collected from the selected services.

18.   (Original)   The method of claim 14, further comprising the step of:
        performing a standard risk assessment procedure if it is determined that the financial
transaction to be conducted does not have a risk-related dimension, wherein the standard risk
assessment is based on the average of the numerical designation for all of the risks.

19.   (Previously presented)   The method of claim 14, wherein the type of the
financial transaction to be conducted at the branch of a financial institution comprises
opening an account, and wherein the risk dimension for the account opening is based on the
risk due to the identified nature of the customers served by the branch of the financial
institution.

20.   (Previously presented)   The method of claim 19, wherein the identified nature
of the customers served by the branch of the financial institution includes high-risk clientele,
and wherein the special risk assessment procedure is performed for the account opening.

21.   (Original)   The method of claim 13, wherein when it is determined to perform a
special risk assessment procedure for a financial transaction, the special risk assessment
procedure is performed semi-annually, and wherein when it is determined to perform a
standard risk assessment procedure for a financial transaction the standard risk assessment is
performed annually.

22.   (Previously presented)   The method of claim 12, further comprising the step of:
        overriding by an authorized user the recommended guidelines for handling the
financial transaction to be conducted.

23.   (Original)   The method of claim 22, wherein the authorized user provides
alternative guidelines after the step of overriding the recommended guidelines for handling
the financial transaction to be conducted.